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2022-CC10345 - ELLEN J HUDSON V RANDI D CRANE (E-CASE)

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Memorandum to Clerk - Return of Service; Return of Service.

**Filed By:** TIMOTHY JOSEPH GALLAGHER**On Behalf Of:** ELLEN J HUDSON☐ [Summons Personally Served](#)

Document ID - 21-SMOS-120; Served To - CRANE, RANDI D.; Server - ; Served Date - 18-JAN-21; Served Time - 00:00:00; Service Type - Special Process Server; Reason Description - Served

01/06/2021 ☐ [Alias Summons Issued](#)

Document ID: 21-SMOS-120, for CRANE, RANDI D..

12/22/2020 ☐ [Alias Summons Requested](#)

Memorandum To Clerk - Request for Alias Summons.

**Filed By:** TIMOTHY JOSEPH GALLAGHER**On Behalf Of:** ELLEN J HUDSON12/01/2020 ☐ [Jury Trial Scheduled](#)**Scheduled For:** 05/17/2021; 9:00 AM ; MICHAEL FRANCIS STELZER; City of St. Louis11/20/2020 ☐ [Summ Issd- Circ Pers Serv O/S](#)

Document ID: 20-SMOS-4975, for CRANE, RANDI D..

11/18/2020 ☐ [Filing Info Sheet eFiling](#)**Filed By:** TIMOTHY JOSEPH GALLAGHER☐ [Pet Filed in Circuit Ct](#)

Petition.

**Filed By:** TIMOTHY JOSEPH GALLAGHER**On Behalf Of:** ELLEN J HUDSON☐ [Judge Assigned](#)

**ELLEN J. HUDSON,**  
 )  
 )  
 )  
**Plaintiff,** ) **Cause Number:**  
 )  
**v.** ) **Division:**  
 )  
**RANDI D. CRANE,** )  
 )  
**Serve: 204 Lakewood Drive** )  
**Brighton, Illinois 62012-1184** )  
**(Macoupin County)** )  
 )  
**Defendant.** )

COMES NOW Plaintiff Ellen J. Hudson, by and through the undersigned counsel, and for her cause of action against Randi D. Crane, states and alleges as follows:

1. Plaintiff Ellen J. Hudson is an individual who at all times resided in St. Louis County, Missouri.

2. Defendant Randi D. Crane is an individual who at all times resided in Macoupin County, Illinois.

3. On February 28, 2019, plaintiff and defendant were operating motor vehicles traveling northbound on Kingshighway in the City of St. Louis near the intersection of Ridge Avenue, both open and public roadways.

4. Defendant's automobile came into collision with the rear of plaintiff's automobile.

5. Defendant was thereby negligent.

6. The negligence of defendant caused or contributed to cause plaintiff to suffer personal injury.

WHEREFORE, plaintiff Ellen J. Hudson prays for judgment against defendant Randi D. Crane in an amount in excess of Twenty-Five Thousand Dollars (\$25,000.00) together with costs, interest, and such further relief as the Court deems just and appropriate.

**GALLAGHER DAVIS, L.L.P.**

/s/ Timothy J. Gallagher

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Timothy J. Gallagher, MBN 37872  
2333 South Hanley Road  
St. Louis, Missouri 63144  
(314) 725-1780  
Fax: (314) 725-0101  
[Tim@GallagherDavis.com](mailto:Tim@GallagherDavis.com)

Attorneys for Plaintiff



## IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

|   |   |                          |
|---|---|--------------------------|
| Judge or Division:<br>REX M BURLISON        | Case Number: 2022-CC10345   | Special Process Server 1 |
| Plaintiff/Petitioner:<br>ELLEN J HUDSON     | Plaintiff's/Petitioner's Attorney/Address:<br>TIMOTHY JOSEPH GALLAGHER<br>2333 S. HANLEY RD.<br>SAINT LOUIS, MO 63144 | Special Process Server 2 |
| vs.   |   | Special Process Server 3 |
| Defendant/Respondent:<br>RANDI D. CRANE     | Court Address:<br>CIVIL COURTS BUILDING<br>10 N TUCKER BLVD<br>SAINT LOUIS, MO 63101                                  | (Date File Stamp)        |
| Nature of Suit:<br>CC Pers Injury-Vehicular |   |                          |

**Summons for Personal Service Outside the State of Missouri**  
(Except Attachment Action)

The State of Missouri to: **RANDI D. CRANE**  
Alias:

204 LAKEWOOD DRIVE  
BRIGHTON, IL 62012

**MACOUPIN COUNTY IL SHERIFF**

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the plaintiff/petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

**November 20, 2020**

Date

Further Information:

*Thomas Koeppinger*  
Clerk

**Officer's or Server's Affidavit of Service**

I certify that:

- I am authorized to serve process in civil actions within the state or territory where the above summons was served.
- My official title is \_\_\_\_\_ of \_\_\_\_\_ County, \_\_\_\_\_ (state).
- I have served the above summons by: (check one)
  - ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
  - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
  - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).
  - ☐ other: \_\_\_\_\_

Served at \_\_\_\_\_ (address)

in \_\_\_\_\_ County, \_\_\_\_\_ (state), on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

**Subscribed and sworn to** before me this \_\_\_\_\_ (day) \_\_\_\_\_ (month) \_\_\_\_\_ (year).

I am: (check one)

- ☐ the clerk of the court of which affiant is an officer.
- ☐ the judge of the court of which affiant is an officer.
- ☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
- ☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

Signature and Title

**Service Fees**

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)

**Total** \$ \_\_\_\_\_

See the following page for directions to officer making return on service of summons.

### **Directions to Officer Making Return on Service of Summons**

A copy of the summons and a copy of the motion must be served on each defendant/respondent. If any defendant/respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the defendant's/respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age who permanently resides with the defendant/respondent, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the defendant/respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The officer making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must be made less than 10 days nor more than 30 days from the date the defendant/respondent is to appear in court. The return should be made promptly, and in any event so that it will reach the Missouri court within 30 days after service.

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS  
22<sup>nd</sup> JUDICIAL CIRCUIT  
STATE OF MISSOURI

|                               |   |               |              |
|-------------------------------|---|---------------|--------------|
| ELLEN J. HUDSON,              | ) |               |              |
|                               | ) |               |              |
|                               | ) |               |              |
| Plaintiff,                    | ) | Cause Number: | 2022-CC10345 |
|                               | ) |               |              |
| v.                            | ) | Division:     | 1            |
|                               | ) |               |              |
| RANDI D. CRANE,               | ) |               |              |
|                               | ) |               |              |
| Serve: 204 Lakewood Drive     | ) |               |              |
| Brighton, Illinois 62012-1184 | ) |               |              |
| (Macoupin County)             | ) |               |              |
|                               | ) |               |              |
| Defendant.                    | ) |               |              |

**MEMORANDUM TO CLERK**  
**REQUEST FOR ALIAS SUMMONS**

COMES NOW Plaintiff, by and through the undersigned counsel and hereby requests that an **Alias** Summons be issued to Defendant Randi D. Crane at 204 Lakewood Drive, Brighton, Illinois 62012-1184 to be served by the Sheriff of Macoupin County, Illinois.

**GALLAGHER DAVIS, L.L.P.**

/s/ Timothy J. Gallagher

Timothy J. Gallagher, MBN 37872  
2333 South Hanley Road  
St. Louis, Missouri 63144  
(314) 725-1780  
Fax: (314) 725-0101  
[Tim@GallagherDavis.com](mailto:Tim@GallagherDavis.com)

Attorneys for Plaintiff

|   |   |                   |
|---|---|-------------------|
| Judge or Division:<br>MICHAEL FRANCIS STELZER | Case Number: 2022-CC10345   |                   |
| Plaintiff/Petitioner:<br>ELLEN J HUDSON       | Plaintiff's/Petitioner's Attorney/Address:<br>TIMOTHY JOSEPH GALLAGHER<br>2333 S. HANLEY RD.<br>SAINT LOUIS, MO 63144 |                   |
| vs.   |   |                   |
| Defendant/Respondent:<br>RANDI D. CRANE       | Court Address:<br>CIVIL COURTS BUILDING<br>10 N TUCKER BLVD<br>SAINT LOUIS, MO 63101                                  | (Date File Stamp) |
| Nature of Suit:<br>CC Pers Injury-Vehicular   |   |                   |

Rules 54.06, 54.07, 54.14, 54.20;  
506.500, 506.510 RSMo

### **Directions to Officer Making Return on Service of Summons**

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IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS  
22<sup>nd</sup> JUDICIAL CIRCUIT  
STATE OF MISSOURI

ELLEN J. HUDSON,

Plaintiff,

v.

RANDI D. CRANE,

Defendant.

)  
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)  
)  
)  
)  
)  
)

Cause Number: 2022-CC10345

Division: 1

**MEMORANDUM TO CLERK**  
**RETURN OF SERVICE**

COMES NOW Plaintiff, by and through the undersigned counsel and hereby files the return of service of Defendant Randi Crane, which was served by the Sheriff of Macoupin County, Illinois on January 18, 2021.

**GALLAGHER DAVIS, L.L.P.**

/s/ Timothy J. Gallagher

Timothy J. Gallagher, MBN 37872  
2333 South Hanley Road  
St. Louis, Missouri 63144  
(314) 725-1780  
Fax: (314) 725-0101  
[Tim@GallagherDavis.com](mailto:Tim@GallagherDavis.com)

Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that on this 22nd day of January, 2021 the foregoing instrument was electronically filed with the Clerk of the Court and served upon all counsel of record via means of the Notice of Electronic Filing pursuant to Court Operating Rule 27.01.

/s/ Timothy J. Gallagher